

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

SHINE A LIGHT, LLC	:
	:
Plaintiff	:
	:
vs.	:
	:
DEPARTMENT OF THE NAVY	:
	:
Defendant	:

COMPLAINT

1. This is a Freedom of Information Act (FOIA) lawsuit seeking documents appointing the current members of the Board for Corrections of Naval Records (BCNR) as well as the members' names, job titles, office addresses, office email addresses, and GS or similar grade level.

2. Plaintiff is SHINE A LIGHT, LLC. a Pennsylvania limited liability company doing business in Western Pennsylvania.

3. Defendant is the United States Navy.

4. This Court has jurisdiction under 28 U.S.C. § 1331 and 5 U.S.C. § 552(a)(4)(B).

5. On September 27, 2024, Plaintiff submitted a FOIA requesting seeking documents containing the information specified in paragraph one above. A copy of the request is attached hereto as Exhibit "A".

6. On October 3, 2024 the BCNR denied most of the request. It released highly redacted documents revealing the names of six of the dozens of BCNR members and none of the other requested information. A copy of the denial is attached hereto as Exhibit “B”.

7. On October 3, 2024, Plaintiff filed an appeal. A copy of the appeal is attached hereto as Exhibit “C”.

8. The time for the Navy to respond to the appeal has elapsed.

9. The withholding of the requested documents by the Navy is improper. The BCNR is a statutory board. See, 10 U.S.C. § 1552. Its members exercise significant authority of the United States, and its members are therefore constitutional “Officers of the United States.” The identify of Officers cannot be withheld from the public.

WHEREFORE, Plaintiff prays this this Honorable Court:

- a) Order Defendant to release the requested documents;
- b) Award Plaintiff reasonable attorney fees and costs.

Respectfully submitted
/s/**Jason W. Manne**
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